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May 7, 2010

Scott Berman  
Acting Chief Operating Officer  
CDFI Fund  
U.S. Department of the Treasury  
601 13th Street, NW. , Suite 200 South  
Washington, DC 20005

Dear Mr. Berman,

Nonprofit Finance Fund is submitting this letter on behalf of the CDFIs listed below. The undersigned national certified CDFIs are pleased to provide comments as requested by the CDFI Fund (the "Fund") regarding changes to its authorizing statute, the Riegle Community Development and Regulatory Improvement Act of 1994.

While some may have submitted additional recommended changes individually or as part of other letters, there is one request for change that is specific to the certification process for national CDFIs; comments on this issue are detailed herein.

All of the organizations below serve national Target Markets across the country. While our markets may vary we each serve multiple geographic markets all of which are distressed. According to the current CDFI certification process, CDFIs must demonstrate that they serve an eligible Target Market(s) by using the CDFI Fund mapping tool to identify each and every community that they designates as part of their Target Market(s). Given a national presence, our Target Markets are extensive, spanning hundreds of neighborhoods across the country.

In order to make the certification process reasonable we propose requiring national CDFIs to certify that at least 60% of all financing provided or loans made have been, and will continue to be, to borrowers located in or serving an "investment area" or a "low-income targeted population". This would demonstrate the level of impact the CDFI is having on low-income communities without subjecting the CDFI to excessive mapping requirements.

We sincerely thank the Fund for the opportunity to share our views on the proposed changes to the CDFI Fund authorizing statute. We look forward to working with you to continue to shape the future direction of the Fund and its programs. Please feel free to contact Norah McVeigh at the Nonprofit Finance Fund at [norah.mcveigh@nffusa.org](mailto:norah.mcveigh@nffusa.org) if you have further questions.

Sincerely,

ACCION USA  
Enterprise Community Loan Fund  
Local Initiatives Support Corporation  
Mercy Loan Fund  
National Federation of  
Community Development Credit Unions  
Nonprofit Finance Fund  
Partners for the Common Good

